

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 08-05-SLR
	:	
TERRENCE ROSS,	:	
	:	
Defendant.	:	

**MOTION FOR CONTINUANCE OF EVIDENTIARY HEARING**

The Defendant, Terrence Ross, by and through his counsel, Eleni Kousoulis, Esquire, hereby moves the Court for an Order continuing the evidentiary hearing in this case.

In support of the motion, the defense submits as follows:

1. An evidentiary hearing in this matter is scheduled for April 30, 2008 at 4:00 p.m.
2. The government has extended a plea offer to the Defendant in this case that was initially presented to the Defendant on April 28, 2008, and the Defendant needs additional time to consider this offer. Should the Defendant accept this offer, an evidentiary hearing will not be needed.
3. The Defendant respectfully requests that the evidentiary hearing in this matter be continued for at least two weeks to allow him adequate time to consider the government's offer.
4. Assistant United States Attorney, Ilana Eisenstein, does not oppose the Defendant's request for a continuance.
5. The Defendant agrees to waive, pursuant to the Speedy Trial Act, any time between April 30, 2008 and the rescheduled date for the hearing.

**WHEREFORE**, for these reasons and any other such reasons that shall appear to the Court, the Defendant, Terrence Ross, respectfully requests that the evidentiary hearing in this case be continued to any time after May 16, 2008.

Respectfully Submitted,

/s/ Eleni Kousoulis  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
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Counsel for Defendant Terrence Ross

Dated: April 30, 2008

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	:	
Defendant.	:	

**ORDER**

In response to Defendant's Motion for Continuance of Evidentiary Hearing, this Court HEREBY ORDERS on this \_\_\_\_\_ day of \_\_\_\_\_, 2008, that Mr. Ross' evidentiary hearing be re-scheduled for the \_\_\_\_\_ day of \_\_\_\_\_, 2008, at \_\_\_\_\_ a.m./p.m., and that the time from April 30, 2008 up to the day of the re-scheduled evidentiary hearing shall be excluded under the Speedy Trial Act (18 U.S.C. § 3161, et seq.).

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HONORABLE SUE L. ROBINSON  
United States District Court